

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	WC Docket No. 09-197
Telecommunications Carriers Eligible for	)	
Universal Service Support	)	WC Docket No. 10-90
	)	
Connect America Fund	)	
	)	

**COMMENTS OF THE STANDING ROCK SIOUX TRIBE AND STANDING ROCK  
TELECOMMUNICATIONS, INC. ON SECOND FURTHER NOTICE OF PROPOSED RULEMAKING ON  
LIFELINE AND LINK UP REFORM AND MODERNIZATION**

The Standing Rock Sioux Tribe (“Tribe”) and Standing Rock Telecommunications, Inc. (“SRTI”), the Tribe’s wholly owned telecommunications company, provide these comments on the FCC’s “Second Further Notice of Proposed Rulemaking on Lifeline and Link Up Reform and Modernization.” We strongly support the continued availability of enhanced Lifeline and Link Up support for eligible residents on tribal lands. We also support the FCC incorporating broadband into Lifeline – as this represents a positive and necessary step toward providing modern communications to tribal lands. At the same time, we urge the FCC to expand its outreach to Indian country and to provide greater opportunities for more comprehensive consultation with the Tribes with respect to the issues addressed in the Second Further Notice, and with respect to Universal Service and broadband more generally.

While we strongly urge the FCC to consult more broadly with tribes, we also take this opportunity to emphasize that circumstances at Standing Rock underscore the need for the Lifeline and Link Up programs.

Standing Rock is a federally-recognized Indian tribe, with approximately 9,000 members. The Standing Rock Reservation is a sparsely populated, rural Reservation that lies partly in South Dakota and partly in North Dakota, and covers some 2.3 million acres. The Reservation's population is approximately 8,500 people, including both Tribal members and non-member residents. The population density on the Reservation is 3.7 persons per square mile in the North Dakota portion of our Reservation, and 1.7 persons per square mile in the South Dakota portion of our Reservation. Our Reservation continues to suffer from chronic poverty and high unemployment, with a persistent unemployment rate significantly above 50%. Our rural location and lack of adequate infrastructure of all kinds – including roads, water and sanitation as well as telecommunications – contribute to the economic challenges faced by the Tribe. Due to these economic circumstances, over 90% of our households are eligible for support through the Lifeline and Link Up programs. In addition, our Reservation has a broadband penetration rate of only 50%.

With both landline and mobile service severely lacking on the Reservation, the Tribe a few years ago took it upon itself to launch its own Tribal telecommunications company and network. SRTI is 100% owned by the Tribe. In August 2010, SRTI was designated an "Eligible Telecommunications Carrier ("ETC") for a portion of the Reservation, and in July 2011 became an ETC for the entire Reservation.

SRTI has purchased bandwidth and invested in the basic telecommunications infrastructure that was lacking on the Reservation – starting with 17 cellular towers. SRTI initially launched mobile service in 2010, and today serves over 900 wireless customers on the Reservation. SRTI's services provide a vast improvement over the prior service on the

Reservation in terms of quality and coverage. But SRTI recognizes that much needs to be done to keep pace with the rapid changes in technology and to provide the full measure of high quality telecommunications – including broadband. SRTI is committed to meeting this challenge, working with the FCC.

As a large, rural reservation facing widespread poverty, Standing Rock has a vast need for Lifeline and Link Up. Many of the Tribe's initiatives – in education, health and law enforcement – require effective communications systems throughout the Reservation. Broadband is the basic mechanism for modern communications – as broadband can enable students to do their homework effectively, provide better health care outreach to the homebound, and enhance law enforcement in our communities. Without broadband, our efforts to improve the quality of life at Standing Rock in all of these key areas are impeded. It is clear that without broadband included in Lifeline and Link Up, far too many people at Standing Rock would be left behind.

At the same time, our experience demonstrates that there are some bureaucratic impediments with regard to Lifeline and Link Up. For example, on our rural Reservation, many roads are referred to by a certain name by the local county, while the same road is referred to by another name by the Tribe or the Bureau of Indian Affairs. This creates delays and confusion as we seek to have eligible persons certified for Lifeline. Time delays sometimes lead potential customers to walk away – despite the advantages of Lifeline. This problem should be easily addressed by better communication between SRTI and FCC, and we will certainly continue to work with your staff in this regard. But the broader point is that, to work as intended, Lifeline

and Link Up must be implemented flexibly, with an understanding of the particular facts and circumstances on the ground on tribal lands.

Along the same lines, it is important to understand how housing conditions at Standing Rock impact the Lifeline and Link Up programs. On our Reservation there is a serious and chronic lack of available housing. As a result, it is common for extended families to share a single address and live together. A home intended to accommodate 5 persons, may in fact serve as the home for 10 or 12 persons. This is not an unusual situation on our Reservation. To the contrary, a substantial portion of our people are forced to live in such difficult, overcrowded conditions.

Efforts to address the housing shortage at Standing Rock (and many other Reservations) are ongoing. But this is a major, ongoing problem and we do not have sufficient resources to address our housing needs. In this regard as well, flexibility is needed in the implementation of Lifeline. If an arbitrary limit is placed on the per-household subsidy for activation and service, our people will suffer. This is particularly so with respect to cell phone service. We urge you to think about how difficult it would be to live in your own home – with your spouse and children, and with your in-laws and their family always living there with you – with a single cell phone available to be shared by everyone. With our overcrowded housing, that is what our people face if the per household limit on Lifeline is applied too narrowly. For us, this is not just a matter of inconvenience. Rather, on our remote rural Reservation, access to cell phones is critically important in meeting educational and health needs, and in protecting public safety. In this context, there is tremendous value in allowing more than one eligible user per household (or, more precisely, in defining “household” more reasonably in light of conditions on tribal lands).

In conclusion, Lifeline and Link Up are vitally important to our efforts to provide needed telecommunication services to the people living on our tribal lands, and adding broadband to Lifeline is a big step forward. We look forward to continuing to work with you to find more effective ways to implement Lifeline and Link Up on tribal lands.

Respectfully submitted,



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Dave Archambault, II  
Chairman, Standing Rock Sioux Tribe



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Joe Dunn  
Chairman of the Board, Standing Rock Telecommunications, Inc.